**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEE**

In re: Terrorist Attacks on September 11, 2001 (Case No. 03 MDL 1570 (GBD) (SN))

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeftle, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

May 15, 2019

The Honorable Sarah Netburn, U.S. Magistrate Judge  
 United States District Court for the S.D.N.Y.  
 Thurgood Marshall U.S. Courthouse, Room 430  
 40 Foley Square  
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn,

On behalf of the Plaintiffs' Executive Committees and with the agreement of the Department of Justice on behalf of the FBI, and as Your Honor directed during the status conference on Monday, May 13, 2019, we are writing to propose jointly the following briefing schedule concerning the referenced motions to compel:

- Plaintiffs will file their motion to compel as to the four individuals (Jraithen, al-Sadhan, al-Sudairy, and Abdi Mohammed) and to release an unredacted version of the 2012 Summary Report by May 31, 2019. Plaintiffs will also ask that the Court direct the FBI to produce immediately an unredacted version of the 2012 Summary Report for *in camera* review, as an interim measure to speed the resolution of the motion to compel.
- By May 22, 2019, plaintiffs will serve the DOJ with a letter identifying the redactions to the 2012 Summary Report they intend to challenge.
- The FBI will respond to plaintiffs' motion to compel as to the four individuals by June 21, 2019. If the FBI intends to oppose *in camera* review of the unredacted 2012 Summary Report by the Court, those arguments will be included in its June 21, 2019 brief.
- The FBI will respond to plaintiffs' motion to compel release of an unredacted version of the 2012 Summary Report by August 30, 2019. If the FBI is going to submit any affidavits or declarations in support of assertions of privilege (state secrets or otherwise) or any other

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grounds to withhold information from the 2012 Summary Report, those shall be submitted with the FBI's opposition by August 30, 2019.

- The PECs and DOJ agree that reply briefs will be necessary and appropriate in relation to these issues. The PECs and DOJ agree that they will confer after each FBI opposition is filed to determine an appropriate deadline and other details for plaintiffs' reply to the FBI's briefs.

Respectfully submitted,

KREINDLER & KREINDLER LLP

MOTLEY RICE LLC

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*For the Plaintiffs' Exec. Committees*

*For the Plaintiffs' Exec. Committees*

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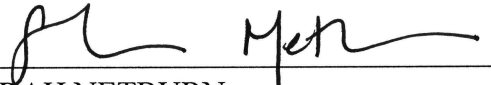
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*For the Plaintiffs' Exec. Committees*

The parties' proposed briefing schedule is ADOPTED. Within five days of the FBI's June 21 and August 30 oppositions, the parties shall file a joint letter proposing a deadline for Plaintiffs to submit a reply brief, if any. In addition, for the reasons stated on the record during the May 13 conference, the FBI is ORDERED to produce the final tranche of "core" records no later than Friday, July 12, 2019.

**SO ORDERED.**

May 16, 2019  
New York, New York

  
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SARAH NETBURN  
United States Magistrate Judge